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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

: **CRIMINAL COMPLAINT**

v.

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Mag. No. 14-4110 (MAH)

KENNETH A. NORMAN

I, David M. Fallon, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Department of Homeland Security, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.



Special Agent David M. Fallon  
Department of Homeland Security

Sworn to before me and subscribed in my presence,  
October 8, 2014 in Newark, New Jersey

HONORABLE MICHAEL A. HAMMER  
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

**ATTACHMENT A**

From in or about January 2014 through in or about February 2014, in Sussex County, in the District of New Jersey and elsewhere, defendant

KENNETH A. NORMAN

did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been mailed, and using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer,

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1), and Title 18, United States Code, Section 2.

**ATTACHMENT B**

I, David M. Fallon, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"). I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Sussex County Prosecutor's Office received a Cyber Tipline Report from the National Center for Missing & Exploited Children ("NCMEC"). According to the report, the email address DDR.xREVENGE6@gmail.com uploaded five images of suspected child pornography on February 23, 2014. Results of a subpoena revealed that on February 23, 2014, the IP address used to upload the suspected child pornography was subscribed to a modem associated with an address in Newton, New Jersey.

2. On or about April 10, 2014, state law enforcement officers searched the address in Newton pursuant to a search warrant. The defendant, KENNETH A. NORMAN ("NORMAN") was sleeping on the couch inside.

3. After being advised of his Miranda rights, NORMAN stated that he was the owner of DDR.xREVENGE6@gmail.com. He further admitted to sending and receiving child pornography using a messaging application on his cellular telephone.

4. A forensic review of NORMAN's computer revealed multiple sexually explicit video files of a minor female ("Victim 1"). The information stored within the video files indicated that the video files were created in Pennsylvania. Law enforcement officers recovered multiple emails from NORMAN's cellular telephone that were sent in or about January 2014 and February 2014 from the same gmail.com email address to darkassassin.ken.norman@gmail.com. These emails contain sexually explicit videos of Victim 1, as well as sexually explicit videos of a pre-pubescent female ("Victim 2"). Three of these videos are described below:

File Name	Approximate Date Received by NORMAN	Description
VID.20140121.164804.3gp	January 21, 2014	This video is approximately twenty seconds long and starts with what appears to be a close-up of the nude lower half of Victim 1. Victim 1 proceeds to insert and retract a red vibrator into her anus multiple times. In the background, a tile floor

		is visible.
VID.20140121.164844.3GP	January 21, 2014	This video is approximately one minute and thirty-six seconds long and starts with what appears to be a close-up of the nude lower half of Victim 1. Victim 1 proceeds to insert and retract a red vibrator into and out of her anus. A tile floor and several bottles that appear to be shampoo, deodorant, and other assorted bath items are visible in the background.
VID.20140203.222933.3GP	February 3, 2014	The video is approximately one minute and fifteen seconds long and starts with what appears to be a close-up of the nude lower half of Victim 2. Victim 2 is using one hand to open her vagina while inserting a finger from her other hand. She appears to be sitting on a brown chair. Approximately three seconds into the video, a third hand moves Victim 2's hand away from Victim 2's genital area to achieve a clearer view of Victim 2's genital area. Later the third hand holds Victim 2's hand as Victim 2 more rapidly inserts her finger into her vagina. During part of the video, Victim 2's face is visible.

5. Also found saved on NORMAN's computer were multiple video images showing Victim 1's face, in which the same bathroom floor and red vibrator described above are visible.